

July 14, 2000

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W., Room TW-204B
Washington, DC 20554

**Re: ET Docket No. 99-231, Amendment of Part 15 of the Commission's
Rules Regarding Spread Spectrum Devices**

Dear Ms. Salas:

Texas Instruments is a member of Bluetooth, a cross-industry group formed to establish industry wide specifications for wireless voice and data communications operating in the 2.4 Gigahertz (GHz) band. Texas Instruments is planning to develop chipsets implementing Bluetooth protocols for worldwide markets for applications such as Mobile Phones, Digital Cameras and Digital Light Modulators.

Texas Instruments, two weeks ago, announced the purchase of Alantro Communications, a technology company specializing in and developing products for current IEEE 802.11b LANs as well as extending this technology to higher speeds with backwards compatibility. We believe that this higher speed technology can be certified based upon the Commission's current rules without changes. Alantro Communications is a member of Bluetooth as well as Wireless Ethernet Compatibility Alliance (WECA), whose "mission is to certify interoperability of Wi-FiTM (IEEE 802.11b High Rate) wireless LAN products and to promote Wi-FiTM as the standard for wireless LAN deployments across all market segments". As you know, both of these groups have serious reservations about the proposed rule changes.

According to Chris Heegard, the CEO of Alantro, the proposed rule changes for WBFH allow the introduction of signals with spectral characteristics that were formerly disallowed under the existing rules. This means that the large base of current products that were built under the existing rules are threatened with interference that was not previously allowed or anticipated. From a fairness position, this is unjust. Similar wide-band frequency hopped signals were disallowed for the 2.4 GHz band. Allowing such signals at this juncture is unfair to the parties that were previously rejected.

While Texas Instruments has previously submitted a letter in support of the NPRM, we believe that the compromise position proposed by Lucent, Ericsson, Nokia and 3Com on May 17, 2000 (second paragraph of Summary) is best for the industry. Texas Instruments is concerned that the proposed wideband frequency hopping rules changes will cause harmful interference to both Bluetooth, IEEE 802.11b and higher speed extensions to IEEE 802.11b. As that analysis demonstrates, the proposed rule changes would substantially degrade these other wireless LAN devices, thereby jeopardizing their commercial viability.

Accordingly, Texas Instruments requests that the Commission support the Lucent, Ericsson, Nokia, and 3Com compromise proposal and reject the original NPRM request.

Sincerely,

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